REMARKS

Claims 1-40 are pending in this application. Claims 8-10, 12, 16-18, and 32-34 are cancelled without prejudice or disclaimer, claims 5, 7, 11, 13, 19-21, 24, 28-31 and 35-40 are amended, and claims 41-50 are added herein.

It is noted that the applied Pintsov reference is missing from the Notice Of References Cited by the Examiner. It is respectfully requested that a further notice be entered citing the Pintsov reference.

The specification is amended to include the serial numbers and filing dates of the related applications. No new matter is added.

The declaration of inventor Kight is objected to because the typed residential address on the originally filed Declaration was changed without the inventor initialing and dating the change. A Supplemental Declaration and Power of Attorney executed by inventor Kight is submitted herewith to overcome the objection.

Claims 5, 7, 11, 13, 20, 21, 24, 28-31 and 36-40 are amended solely for clarification and not to overcome the prior art rejections which will be addressed in detail below.

Claims 1-40 stand rejected under 35 USC § 103(a) as obvious over Kight et. al. (U.S. Patent No. 5,383,113) in view of Pintsov et. al. (U.S. Patent No. 5,612,889). Claims 19 and 35 are amended to more clearly distinguish over the prior art. To the extent not addressed by the amendments to claims 19 and 35 the rejection is respectfully traversed.

The Examiner's reasons for rejection of the independent claims are reproduced here for convenience. The rejection of claim 1 reads:

> As per claim 1, Kight et al. disclose a method for electronically processing bill payment requests, comprising the steps of:
>
> Receiving respective sets of payment requests electronically from a plurality of independent sources, each set of payment requests corresponding to an associated set of payors requesting payments to a plurality of payees (Col. 2, lines 38-53); and
>
> Processing the payment requests at a single remittance processing system having a database including payee information for each of the plurality of payees (see FIG. 1, element 50; Col. 2, lines 5-11).
>
> Kight et al. disclose all the limitations above, but Kight et al. fail to explicit disclose the step of generating payment directions for paying the plurality of payees in accordance with the processed payment requests. However, Pintsov et al. disclose a mailing processing which assigns delivery destination code based on a unique identifier (Col. 7, lines 49-56). It would have been obvious to a person of ordinary skill in the art at the time of the applicant's invention to combine the disclosure of Kight et al. with Pintsov et al. for the motivation of ensuring that payments are correctly directed to the intended entity.

The rejection of claim 19 reads:

> As per claim 19, Kight et al. disclose an electronic bill payment system for processing requests, comprising:

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An input port for receiving payor payment requests from a plurality of separate sources (see FIG. 1, element 52 and Col. 2, lines 49-51).

a database configured to store records associated with a plurality of payees (see FIG. 2, element 22 and Col. 2, line 51); and

A processor for processing the payment requests to generate payment directions for paying the plurality of payees in accordance with the received payment requests and the records stored in the database associated with the plurality of payees (see FIG. 1, element 40; Col. 4, line 32 and lines). Kight et al. disclose all the limitations above, but Kight et al. fail to explicit disclose the step of generating payment directions for paying the plurality of payees in accordance with the processed payment requests.

However, Pintsov et al. disclose a mailing processing which assigns delivery destination code based on a unique identifier (Col. 7, lines 49-56). It would have been obvious to a person of ordinary skill in the art at the time of the applicant's invention to combine the disclosure of Kight et al. with Pintsov et al. for the motivation of ensuring that payments are correctly directed to the intended entity.

The rejection of claim 35 reads:

As per claim 35, Kight et al. disclose a system for processing payment information, comprising:

one or more networks (see FIG. 1)

A plurality of source stations, coupled to the networks, each source station configured to collect payment requests, each request containing payment information, including a payee

name, payee address data and a payor
account number with a payee (Col. 2,
liens 38-53), and centralized
remittance station, coupled to the
networks, having a payee database, and
configured to receive the payment
information from at least one of the
source stations via at least one of the
networks (see FIG. 2, element 22; Col.
2, lines 40-51). But Kight et al. fail
to explicitly disclose processing the
payment information to produce payment
directions for paying a payee to be
paid selected from the payee database.
However, Pintsov et al. disclose a
mailing processing which assigns
delivery destination code based on a
unique identifier (Col. 7, lines 49-
56). It would have been obvious to one
of ordinary skill in the art at the
time of applicant's invention to
combine the disclosure of Kight et al.
with Pintsov et al. for the motivation
of ensuring that payments are correctly
directed to an intended entity.

It is respectfully submitted that, contrary to the
Examiner's position, the applied art combination lacks any
teaching or suggestion of, for example, the receipt of
respective sets of payment requests as recited in claim 1,
or the processor for processing received respective sets of
payor payment requests as recited in amended claim 19, or
the plurality of source stations which collect respective
sets of payment requests and the centralized remittance
station which receives the sets of payment requests and
processes the payment information contained therein as
recited in claim 35.

More particularly, Kight discloses a system which
allows an individual consumer (payor) to direct payment of
a plurality of the consumer's bills through a service

provider (column 1, lines 12-17, 30-32, 64 and 65, and claim 1, column 8, line 25). The system is accessed directly by the individual consumer via a remote telecommunications device (column 3, lines 55-57). Once connection with the system has been established, the consumer directs the system to make payments to individual payees (column 3, lines 57-59). Thus the disclosed Kight system is configured for individual payors to direct payment of his/her bills by transmitting payment requests directly to the service provider. That is, the service provider receives payment requests from each payee separate from the requests received from other payees.

On the other hand, the present application is directed to a technique for receiving respective sets of payment requests of multiple payors from a plurality of different independent sources (page 9, lines 16-19). Each source transmits a different set of payment requests to the service provider (page 16, lines 15 and 16). Kight does not teach or suggest such a technique, and Pintsov does not cure the deficiency of Kight.

The Examiner appears to construe Kight as failing to disclose the generation of payment directions for paying a plurality of payees in accordance with the processed payment requests, and points to Pintsov (column 7, lines 49-56) as teaching the feature based on the disclosure of mail processing which assigns a delivery destination code based on a unique identifier.

Contrary to the Examiner's assertion, it is respectfully submitted that Pintsov lacks any teaching or suggestion of generating payment directions for paying a plurality of payees in accordance with a processed payment request. Rather, what Pintsov does disclose in the

referenced text is altering a stored zip code due to an address change. Hence, Pintsov's alterations could be used in conjunction with present invention to, for example, update a merchant database. However, Pintsov fails to make obvious the recited generating payment directions for paying the plurality of payees in accordance with the processed payment requests or information of claims 1, 19 and 35.

Further, Pintsov is directed to a mail system for securely protecting the payment to the carrier service by insuring that the carrier service authorizes mail prior to its actual deposit into the postal stream. Each mail piece is marked with a mail piece ID 306 (see Figure 6) other than the zip code, which is used in the authorization process. As disclosed in column 12, lines 51+, the unique mail piece ID is used to access the correct mailing identification file to, as discussed in column 13, lines 8-15, retrieve the extended zip code. As discussed in column 13, lines 22-26, the zip code is then printed on the mail piece as indicated by 1002 of Figure 10 (see column 13, lines 27-30). Hence, the applied combination lacks any teaching or suggestion of generating payment directions for paying a plurality of payees in accordance with processed sets of payment requests as recited.

It is noted that the Examiner's contention that Kight fails to disclose the step of generating payment directions for paying the plurality of payees in accordance with the processed payment requests is not understood. Kight clearly teaches the generation of payment directions for paying payees in accordance with payment requests (claim 1, column 8, lines 38-45). However, Kight generates payment directions based on payment requests received directly from

individual payors, not based on received sets of payment requests as required by independent claims 1, 19 and 35.

Accordingly, it is respectfully requested that the rejection of claim 1 and its dependencies (i.e. pending claims 2-7, 11, and 13-15), amended claim 19 and its dependencies (i.e. pending claims 20-31) and amended claim 35 and its dependencies (i.e. pending claims 36-40) be reconsidered and withdrawn.

Other features recited in the dependent claims of the present application are believed to further independently distinguish over the applied art combination. For example, with respect to claims 2, 3 and 21, the Examiner acknowledges that Kight fails to teach receiving payment requests in a first, second and third format. However, Examiner asserts that Kight teaches ensuring proper payment format (Col. 3, line 39) and that this operates in the same manner as receiving payment requests in a first, second and third format.

However, Kight's disclosure in referenced text relates to ensuring that payments to merchants are in a proper format, not reformatting payment requests. Additionally, Kight fails to disclose normalizing the payment request formats.

With regard to claims 7-10, 25, 27, 36 and 37, the Examiner acknowledges that Kight fails to disclose processing the payment information, other than a received zip code, to identify a zip code which is used to access a database to locate or retrieve a payee record having a corresponding associated zip code. The Examiner points to Pintsov (column 7, lines 49-52) as teaching the processing of mail information to identify an eleven digit zip code. On this basis, the Examiner contends, without providing any

supporting rationale, that in view of this teaching it was obvious to process payment information to identify an eleven digit zip code, and, as understood, to access or retrieve a payee record based on the identified zip code.

Contrary to the Examiner's position, it is respectfully submitted that Pintsov lacks any disclosure of processing payment information (excluding a received zip code) to identify a correct zip code which is used to access a record. Rather, what Pintsov does disclose in the referenced text is altering the stored zip code due to an address change. Hence, as noted above, Pintsov's alterations could be used in conjunction with present invention to, for example, update the merchant database, but clearly fails to make obvious the recited processing of information to identify a zip code which is used to access a record.

Hence, the applied combination lacks any teaching or suggestion of using a zip code, which is identified by processing information excluding a received zip code, to locate or retrieve a file or record which has an associated corresponding zip code. Rather, the combination at best discloses using a unique ID other than the zip code to access a stored payee record to obtain a zip code and printing the zip code on a piece of mail, and, if appropriate, to access a stored payee change of address record to obtain a changed zip code and substituting the changed zip code for the original zip code in the stored payee record.

In addition, the Examiner takes Official Notice that accessing a database to locate payee information corresponding to the eleven digit zip code is old and well known in the art. It is respectfully submitted that this

novel feature of claims 7, 25-27 and 36-38, using a zip code, which is identified by processing information, to locate or retrieve a file or record which has an associated corresponding zip code as recited in the rejected claims, is neither old nor well known in the art.

With regard to claims 11, 28-30 and 40, the Examiner acknowledges that Kight fails to teach identifying one of a plurality of remittance centers. The Examiner points to Pintsov (column 11, lines 39-51) as disclosing the use of a zip code to identify a single delivery point to which delivery is directed. However, Pintsov lacks any disclosure of using an account number to identify one of a plurality of different delivery points associated with a single entity as recited.

With regard to claims 13-15, 31 and 39, the Examiner acknowledges that Kight fails to teach storing alteration rules corresponding to a payee account number format, and transforming the account number included in one of the payment requests into an altered account number according to the alteration rules. The Examiner points to Pintsov (column 11, lines 56-67 and column 12, lines 1-4) as teaching unique identification including an error detection code. On this basis the Examiner contends it was obvious to include alteration rules to ensure that all payments are properly distributed. The Examiner's rationale is not understood.

Pintsov lacks any disclosure of altering the unique identification number. What Pintsov does disclose is altering the zip code due to an address change. Hence as discussed above, Pintsov's alterations could be used in conjunction with the present invention to update the

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merchant database, but clearly fail to make obvious the recited alteration of the account number.

New claims 41-50 are added to recite the invention somewhat differently. It is respectfully submitted that the applied art combination lacks any teaching or suggestion of the various features recited in these new claims as should be understood from the discussion above.

In view of the foregoing, it is respectfully submitted that the application is in condition for allowance and an early indication of the same is courteously solicited. The Examiner is respectfully requested to contact the undersigned by telephone at the below listed local telephone number, in order to expedite resolution of any remaining issues and further to expedite passage of the application to issue, if any further comments, questions or suggestions arise in connection with the application.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 12-0427 and please credit any excess fees to such deposit account.

Respectfully submitted,
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